

2023R00889/CS

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Claire C. Cecchi
	:	
v.	:	Criminal No. 24-6
	:	
JUAN RAFAEL PARRA ARIAS,	:	<u>Count 1</u>
a/k/a "Yofre,"	:	18 U.S.C. § 1349
NEFY VLADIMIR PARRA ARIAS,	:	(Mail and Wire Fraud Conspiracy)
a/k/a "Keko,"	:	
NELSON RAFAEL GONZALEZ	:	<u>Counts 2 – 10</u>
ACEVEDO,	:	18 U.S.C. § 1343
a/k/a "Nelson Tech,"	:	18 U.S.C. § 2
RAFAEL AMBIORIX RODRIGUEZ	:	(Wire Fraud)
GUZMAN,	:	
a/k/a "Max Morgan,"	:	<u>Counts 11 – 16</u>
MIGUEL ANGEL FORTUNA SOLANO,	:	18 U.S.C. § 1341
a/k/a "Botija,"	:	18 U.S.C. § 2
a/k/a "Boti,"	:	(Mail Fraud)
FELIX SAMUEL REYNOSO VENTURA,	:	
a/k/a "Fili,"	:	<u>Count 17</u>
a/k/a "Filly The Kid,"	:	18 U.S.C. § 1956(h)
CARLOS JAVIER ESTEVEZ,	:	(Money Laundering Conspiracy)
LOUIS JUNIOR RODRIGUEZ	:	
SERRANO,	:	<u>Counts 18 – 19</u>
a/k/a "Junior,"	:	18 U.S.C. 1956(a)(1)(B)(i)
MIGUEL ANGEL VASQUEZ,	:	18 U.S.C. § 2
a/k/a "Miguel Disla,"	:	(Money Laundering)
JOVANNI ANTONIO ROSARIO	:	
GARCIA,	:	
a/k/a "Porky,"	:	
a/k/a "Chop," and	:	
JOSE ISMAEL DILONE RODRIGUEZ	:	
	:	

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark,
charges:

INTRODUCTION

1. The defendants and others ran a “family-in-need” or “grandparent” scam from call centers in the Dominican Republic that targeted elderly individuals in the United States. Through impersonation and falsehoods, the defendants and others convinced victims that their loved ones had been arrested and needed money for bail, ultimately defrauding the victims out of millions of dollars (the “Grandparent Fraud Scam”).

COUNT ONE

(Mail and Wire Fraud Conspiracy)

2. At all times relevant to this Indictment:

a. Each of the following defendants (the “defendants”) resided in the Dominican Republic: JUAN RAFAEL PARRA ARIAS, a/k/a “Yofre” (“JUAN RAFAEL PARRA ARIAS”); NEFY VLADIMIR PARRA ARIAS, a/k/a “Keko” (“NEFY VLADIMIR PARRA ARIAS”); NELSON RAFAEL GONZALEZ ACEVEDO, a/k/a “Nelson Tech” (“NELSON RAFAEL GONZALEZ ACEVEDO”); RAFAEL AMBIORIX RODRIGUEZ GUZMAN, a/k/a “Max Morgan” (“RAFAEL AMBIORIX RODRIGUEZ GUZMAN”); MIGUEL ANGEL FORTUNA SOLANO, a/k/a “Botija,” a/k/a “Boti” (“MIGUEL ANGEL FORTUNA SOLANO”); FELIX SAMUEL REYNOSO VENTURA, a/k/a “Fili,” a/k/a “Filly The Kid” (“FELIX SAMUEL REYNOSO VENTURA”); CARLOS JAVIER ESTEVEZ; LOUIS JUNIOR RODRIGUEZ SERRANO, a/k/a “Junior” (“LOUIS JUNIOR RODRIGUEZ SERRANO”); MIGUEL ANGEL VASQUEZ, a/k/a “Miguel Disla” (“MIGUEL ANGEL VASQUEZ”);

JOVANNI ANTONIO ROSARIO GARCIA, a/k/a “Porky,” a/k/a “Chop” (“JOVANNI ANTONIO ROSARIO GARCIA”); and JOSE ISMAEL DILONE RODRIGUEZ.

b. Co-conspirators CC-1, CC-2, CC-3, CC-4, and CC-5 each resided in New York.

c. Victim 1, Victim 2, Victim 4, Victim 5, Victim 6, Victim 7, Victim 8, and Victim 9 each resided in New Jersey.

d. Victim 3 resided in Pennsylvania.

The Fraud Conspiracy

3. From at least in or around January 2019 through in or around December 2023, in the District of New Jersey and elsewhere, the defendants,

**JUAN RAFAEL PARRA ARIAS,
a/k/a “Yofre,”
NEFY VLADIMIR PARRA ARIAS,
a/k/a “Keko,”
NELSON RAFAEL GONZALEZ ACEVEDO,
a/k/a “Nelson Tech,”
RAFAEL AMBIORIX RODRIGUEZ GUZMAN,
a/k/a “Max Morgan,”
MIGUEL ANGEL FORTUNA SOLANO,
a/k/a “Botija,”
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FELIX SAMUEL REYNOSO VENTURA,
a/k/a “Fili,”
a/k/a “Filly The Kid,”
CARLOS JAVIER ESTEVEZ,
LOUIS JUNIOR RODRIGUEZ SERRANO,
a/k/a “Junior,”
MIGUEL ANGEL VASQUEZ,
a/k/a “Miguel Disla,”
JOVANNI ANTONIO ROSARIO GARCIA,
a/k/a “Porky,”
a/k/a “Chop,” and
JOSE ISMAEL DILONE RODRIGUEZ,**

did knowingly and intentionally conspire and agree with each other and others to devise a scheme and artifice to defraud and to obtain money and property from victims, by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing such scheme and artifice to defraud, did:

- a. transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343; and
- b. place in any post office or authorized depository for mail matter, any matter and thing whatever to be sent and delivered by the Postal Service, and deposited and caused to be deposited any matter and thing whatever to be sent and delivered by any private and commercial interstate carrier, and took and received therefrom, any such matter and thing, and knowingly caused to be delivered by mail and such carrier according to the direction thereon and at the place at which it was directed to be delivered by the person to whom it was addressed, any such matter or thing, contrary to Title 18, United States Code, Section 1341.

Goal of the Fraud Conspiracy

4. The goal of the fraud conspiracy was for the defendants and others to enrich themselves by fraudulently obtaining money from elderly victims of the Grandparent Fraud Scam.

Manner and Means of the Fraud Conspiracy

5. It was part of the fraud conspiracy that:

a. JUAN RAFAEL PARRA ARIAS, NEFY VLADIMIR PARRA ARIAS, NELSON RAFAEL GONZALEZ ACEVEDO, and others operated a network of call centers located in Santiago de los Caballeros, Dominican Republic (the “call centers”), out of which they orchestrated the Grandparent Fraud Scam against elderly residents of the United States, including victims residing in New Jersey, New York, Pennsylvania, and Massachusetts. The call centers victimized hundreds of Americans through fraud, stealing millions of dollars.

b. Others working in or near the call centers in the Dominican Republic included RAFAEL AMBIBORIX RODRIGUEZ GUZMAN, MIGUEL ANGEL FORTUNA SOLANO, FELIX SAMUEL REYNOSO VENTURA, CARLOS JAVIER ESTEVEZ, LOUIS JUNIOR RODRIGUEZ SERRANO, MIGUEL ANGEL VASQUEZ, JOVANNI ANTONIO ROSARIO GARCIA, and JOSE ISMAEL DILONE RODRIGUEZ.

c. Conspirators, including defendant NELSON RAFAEL GONZALEZ ACEVEDO, procured voice-over-internet-protocol telephone services that allowed the call centers to mask the origin of their calls in the Dominican

Republic, and to transmit caller identification data making it falsely appear that the calls originated from locations within the United States.

d. From the call centers, members of the conspiracy, referred to as “openers,” called elderly victims in the United States by telephone and impersonated children, grandchildren, or other close relatives of the victims. Typically, the victim was falsely told that a relative had been arrested following an automobile accident somewhere in the Northeastern United States and needed money for bail or other expenses.

e. Once openers successfully duped victims into believing the scam was real, other conspirators working at the call centers, known as “closers,” impersonated defense attorneys, police officers, or court personnel and convinced victims through lies and falsehoods to provide thousands of dollars in cash for non-existent expenses. Closers typically told victims to provide the cash to couriers who visited their homes. In other cases, closers instructed victims to send the cash by mail or using private interstate carriers.

f. Closers working on behalf of the conspiracy included RAFAEL AMBIORIX RODRIGUEZ GUZMAN, MIGUEL ANGEL FORTUNA SOLANO, FELIX SAMUEL REYNOSO VENTURA, CARLOS JAVIER ESTEVEZ, and others.

g. JUAN RAFAEL PARRA ARIAS, NELSON RAFAEL GONZALEZ ACEVEDO, CARLOS JAVIER ESTEVEZ, LOUIS JUNIOR RODRIGUEZ SERRANO, MIGUEL ANGEL VASQUEZ, JOVANNI ANTONIO ROSARIO GARCIA, JOSE ISMAEL DILONE RODRIGUEZ, and others recruited and

dispatched U.S.-based couriers, including CC-1, CC-2, CC-3, CC-4, CC-5, and others (the “couriers”), who then collected cash from elderly victims in New Jersey, New York, Pennsylvania, Massachusetts, and elsewhere.

h. JUAN RAFAEL PARRA ARIAS, NELSON RAFAEL GONZALEZ ACEVEDO, CARLOS JAVIER ESTEVEZ, LOUIS JUNIOR RODRIGUEZ SERRANO, MIGUEL ANGEL VASQUEZ, JOVANNI ANTONIO ROSARIO GARCIA, JOSE ISMAEL DILONE RODRIGUEZ, and others instructed the couriers how to continue deceiving victims by, among other things, using false names and providing fake “receipts” in exchange for cash.

i. JUAN RAFAEL PARRA ARIAS, NELSON RAFAEL GONZALEZ ACEVEDO, CARLOS JAVIER ESTEVEZ, LOUIS JUNIOR RODRIGUEZ SERRANO, MIGUEL ANGEL VASQUEZ, JOVANNI ANTONIO ROSARIO GARCIA, JOSE ISMAEL DILONE RODRIGUEZ, and others communicated with the couriers using wire and electronic communications such as voice calls, text messages, and audio notes, transmitted through encrypted messaging services in interstate and foreign commerce.

j. JUAN RAFAEL PARRA ARIAS, NELSON RAFAEL GONZALEZ ACEVEDO, CARLOS JAVIER ESTEVEZ, LOUIS JUNIOR RODRIGUEZ SERRANO, MIGUEL ANGEL VASQUEZ, JOVANNI ANTONIO ROSARIO GARCIA, JOSE ISMAEL DILONE RODRIGUEZ, and others instructed the couriers to deliver cash taken from victims to co-conspirators in New Jersey and

New York for safekeeping and transmission to the Dominican Republic by wire transfer and other means.

In violation of Title 18, United States Code, Section 1349.

COUNTS TWO through TEN
(Wire Fraud)

6. The allegations in Paragraphs 1, 2, 4, and 5 of this Indictment are realleged here.

7. On the dates specified below, in the District of New Jersey and elsewhere, the defendants named below did knowingly and intentionally devise and attempt to devise a scheme and artifice to defraud, and to obtain money and property from the Victims identified below and others by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice to defraud, did knowingly transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, as set forth more fully below, each such transmission constituting a separate count of this Indictment:

Count	Defendant(s)	Approx. Date	Description
2	JUAN RAFAEL PARRA ARIAS, RAFAEL AMBIORIX RODRIGUEZ GUZMAN, MIGUEL ANGEL FORTUNA SOLANO, FELIX SAMUEL REYNOSO VENTURA, and MIGUEL ANGEL VASQUEZ	May 19, 2021	Communications transmitted through an internet-based messaging application ("Messaging App-1") between New Jersey and the Dominican Republic regarding cash obtained from Victim 1 in Lindenwold, New Jersey
3	CARLOS JAVIER ESTEVEZ	June 3, 2021	Communications transmitted on Messaging App-1 between New Jersey and the Dominican Republic regarding cash obtained from Victim 2 in Hamilton, New Jersey
4	JUAN RAFAEL PARRA ARIAS, RAFAEL AMBIORIX RODRIGUEZ GUZMAN, and MIGUEL ANGEL VASQUEZ	June 24, 2021	Communications transmitted on Messaging App-1 between New Jersey and the Dominican Republic regarding the retrieval of a mail parcel containing cash that Victim 3 shipped to East Orange, New Jersey
5	MIGUEL ANGEL VASQUEZ	July 13, 2021	Communications transmitted on Messaging App-1 between New Jersey and the Dominican Republic regarding cash to be obtained from Victim 4 in Toms River, New Jersey

6	RAFAEL AMBIORIX RODRIGUEZ GUZMAN, MIGUEL ANGEL FORTUNA SOLANO, and MIGUEL ANGEL VASQUEZ	August 5, 2021	Communications transmitted on Messaging App-1 between New Jersey and the Dominican Republic regarding an attempt to obtain cash from Victim 5 in Williamstown, New Jersey
7	CARLOS JAVIER ESTEVEZ	November 30, 2021	Communications with CC-2 transmitted on Messaging App-1 between New Jersey and the Dominican Republic regarding cash obtained from Victim 6 in East Brunswick, New Jersey
8	JOSE ISMAEL DILONE RODRIGUEZ	February 8, 2022	Communications with CC-4 transmitted on Messaging App-2 between New Jersey and the Dominican Republic regarding receipt of cash from Victim 7 in Teaneck, New Jersey
9	JUAN RAFAEL PARRA ARIAS and LOUIS JUNIOR RODRIGUEZ SERRANO	May 17, 2022	Telephone communications originating from the Dominican Republic to New Jersey regarding parcels of cash Victim 8 sent from Warren, New Jersey
10	JUAN RAFAEL PARRA ARIAS and LOUIS JUNIOR RODRIGUEZ SERRANO	June 29, 2022	Communications transmitted on Messaging App-1 between New Jersey and the Dominican Republic regarding cash obtained from Victim 9 in Paterson, New Jersey

In violation of Title 18, United States Code, Section 1343, and Section 2.

COUNTS ELEVEN THROUGH SIXTEEN
(Mail Fraud)

8. The allegations in Paragraphs 1, 2, 4, and 5 of this Indictment are realleged here.

9. On the dates specified below, in the District of New Jersey and elsewhere, the defendants named below did knowingly and intentionally devise and attempt to devise a scheme and artifice to defraud and to obtain money and property from the victims identified below and others by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to do so, knowingly caused to be delivered by mail any matter and thing, specifically those matters referenced in the table below, each constituting a separate count of this Indictment:

Count	Defendant(s)	Approx. Date	Description
11	JUAN RAFAEL PARRA ARIAS, RAFAEL AMBIORIX RODRIGUEZ GUZMAN, and MIGUEL ANGEL VASQUEZ	June 23-24, 2021	U.S. Postal Service package with Tracking Number ending in 193US, containing cash from Victim 3, sent from Warren, Pennsylvania to East Orange, New Jersey
12	JUAN RAFAEL PARRA ARIAS and LOUIS JUNIOR RODRIGUEZ SERRANO	May 17, 2022	Private Carrier-1 package with Tracking Number ending in 9324, containing cash from Victim 8, sent from Warren, New Jersey to Cleveland, Ohio
13	JUAN RAFAEL PARRA ARIAS and LOUIS JUNIOR RODRIGUEZ SERRANO	May 18, 2022	Private Carrier-2 package with Tracking Number ending in 2168, containing cash from Victim 8, sent from Warren, New Jersey to Cleveland, Ohio
14	JUAN RAFAEL PARRA ARIAS and LOUIS JUNIOR RODRIGUEZ SERRANO	May 19, 2022	Private Carrier-1 package with Tracking Number ending in 0746, containing cash from Victim 8, sent from Warren, New Jersey to Cleveland, Ohio
15	JUAN RAFAEL PARRA ARIAS and LOUIS JUNIOR RODRIGUEZ SERRANO	May 20, 2022	Private Carrier-1 package with Tracking Number ending in 7283, containing cash from Victim 8, sent from Warren, New Jersey to Reading, Pennsylvania
16	JUAN RAFAEL PARRA ARIAS and LOUIS JUNIOR RODRIGUEZ SERRANO	May 25, 2022	Private Carrier-1 package with Tracking Number ending in 5765, containing cash from Victim 8 sent from Warren, New Jersey to Cleveland, Ohio

In violation of Title 18, United States Code, Section 1341, and Section 2.

COUNT SEVENTEEN
(Conspiracy to Commit Money Laundering)

10. The allegations contained in paragraphs 1, 2, 4, 5, 7, and 9 of this Indictment are realleged here.

11. From at least in or around January 2019 through in or around December 2023, in the District of New Jersey and elsewhere, the defendants,

JUAN RAFAEL PARRA ARIAS,
a/k/a “Yofre,”
NEFY VLADIMIR PARRA ARIAS,
a/k/a “Keko,”
NELSON RAFAEL GONZALEZ ACEVEDO,
a/k/a “Nelson Tech,”
RAFAEL AMBIORIX RODRIGUEZ GUZMAN,
a/k/a “Max Morgan,”
MIGUEL ANGEL FORTUNA SOLANO,
a/k/a “Botija,”
a/k/a “Boti,”
FELIX SAMUEL REYNOSO VENTURA,
a/k/a “Fili,”
a/k/a “Filly The Kid,”
CARLOS JAVIER ESTEVEZ,
LOUIS JUNIOR RODRIGUEZ SERRANO,
a/k/a “Junior,”
MIGUEL ANGEL VASQUEZ,
a/k/a “Miguel Disla,”
JOVANNI ANTONIO ROSARIO GARCIA,
a/k/a “Porky,”
a/k/a “Chop,” and
JOSE ISMAEL DILONE RODRIGUEZ,

and others, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with each other, and with others, to commit money laundering, by:

- a. knowingly conducting financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, mail fraud and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and while conducting such financial transactions, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(I);
- b. transporting, transmitting, and transferring a monetary instrument or funds from a place in the United States to and through a place outside the United States, knowing that the monetary instruments or funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, or transfer was designed in whole and in part to conceal or disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, that is, mail fraud and wire fraud, in violation of Title 18,

United States Code, Sections 1341 and 1343, contrary to Title 18,

United States Code, Section 1956(a)(2)(B)(i); and

- c. knowingly engaging in monetary transactions in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, mail fraud and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, contrary to Title 18, United States Code, Section 1957(a).

Goal of the Money Laundering Conspiracy

12. It was the goal of the money laundering conspiracy for the defendants and others to enrich themselves by laundering the proceeds of the Grandparent Fraud Scam perpetrated against victims in the United States. The purpose of the transactions was to (a) obscure the source of the funds, (b) move the funds quickly out of the United States, and (c) allow the scammers located in the Dominican Republic to profit from the scheme.

Manner and Means of the Money Laundering Conspiracy

13. It was part of the money laundering conspiracy that:

- a. JUAN RAFAEL PARRA ARIAS, NEFY VLADIMIR PARRA ARIAS, NELSON RAFAEL GONZALEZ ACEVEDO, RAFAEL AMBIBORIX RODRIGUEZ GUZMAN, MIGUEL ANGEL FORTUNA SOLANO, FELIX SAMUEL REYNOSO VENTURA, CARLOS JAVIER ESTEVEZ, LOUIS JUNIOR RODRIGUEZ SERRANO, MIGUEL ANGEL VASQUEZ, JOVANNI ANTONIO ROSARIO

GARCIA, JOSE ISMAEL DILONE RODRIGUEZ, and others in the Dominican Republic, recruited and directed couriers to travel to pick-up cash from the scammers' elderly victims in New Jersey and elsewhere, and to receive parcels containing cash that victims sent from New Jersey and elsewhere.

b. JUAN RAFAEL PARRA ARIAS, NEFY VLADIMIR PARRA ARIAS, NELSON RAFAEL GONZALEZ ACEVEDO, RAFAEL AMBIORIX RODRIGUEZ GUZMAN, MIGUEL ANGEL FORTUNA SOLANO, FELIX SAMUEL REYNOSO VENTURA, CARLOS JAVIER ESTEVEZ, LOUIS JUNIOR RODRIGUEZ SERRANO, MIGUEL ANGEL VASQUEZ, JOVANNI ANTONIO ROSARIO GARCIA, JOSE ISMAEL DILONE RODRIGUEZ, and others in the Dominican Republic directed couriers to engage in financial transactions with funds obtained from the victims, to include delivering cash proceeds from the scam to various co-conspirators who operated money collection points in New York and New Jersey (the "money collectors").

c. The money collectors then conducted further transactions to transmit the proceeds to conspirators in the Dominican Republic and obscure the source of the funds and the identities of the conspirators who controlled them. Such transactions included wiring funds to the Dominican Republic and making bulk cash transfers to other conspirators.

d. Conspirators in the Dominican Republic, including JUAN RAFAEL PARRA ARIAS, NEFY VLADIMIR PARA ARIAS, NELSON RAFAEL GONZALEZ ACEVEDO, and others, directed and coordinated the conversion of the

illicit funds from United States dollars into Dominican pesos to enable the use of the funds in the Dominican Republic, including to promote and pay the operating expenses of the call centers engaged in the Grandparent Fraud Scam.

e. The members of the conspiracy used various means to communicate with each other, including text messages and encrypted messaging applications, to coordinate transactions in fraud proceeds and other activities of the conspiracy.

In violation of Title 18, United States Code, Section 1956(h).

COUNTS EIGHTEEN AND NINETEEN
(Money Laundering)

14. The allegations in paragraphs 1, 2, 4, 5, 7, 9, 12, and 13 of this Indictment are re-alleged here.

15. On or about the dates set forth below, in the District of New Jersey and elsewhere, the defendants named below did knowingly conduct and attempt to conduct the following financial transactions affecting interstate commerce, which involved the proceeds of specified unlawful activity, that is, mail fraud and wire fraud, knowing that the transactions were designed in whole and in part to conceal and disguise, the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity and that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, as set forth more fully below, each such transaction constituting a separate count of this Indictment:

Count	Defendant(s)	Approx. Date	Description
18	MIGUEL ANGEL VASQUEZ	August 4, 2021	Directed courier to conduct transaction in New York with cash obtained from Victim 5 in Williamstown, New Jersey
19	LOUIS JUNIOR RODRIGUEZ SERRANO	June 29, 2022	Directed courier to conduct transaction in New York with cash obtained from Victim 9 in Paterson, New Jersey

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), and Section 2.

FORFEITURE ALLEGATION AS TO COUNTS ONE THROUGH SIXTEEN

16. Upon conviction of the fraud offense in violation of 18 U.S.C. § 1349, as charged in Count One of this Indictment; the fraud offenses in violation of 18 U.S.C. § 1343, as charged in Counts Two through Ten of this Indictment; and the fraud offenses in violation of 18 U.S.C. § 1341, as charged in Counts Eleven through Sixteen of this Indictment, the defendants,

**JUAN RAFAEL PARRA ARIAS,
a/k/a “Yofre,”
NEFY VLADIMIR PARRA ARIAS,
a/k/a “Keko,”
NELSON RAFAEL GONZALEZ ACEVEDO,
a/k/a “Nelson Tech,”
RAFAEL AMBIORIX RODRIGUEZ GUZMAN,
a/k/a “Max Morgan,”
MIGUEL ANGEL FORTUNA SOLANO,
a/k/a “Botija,”
a/k/a “Boti,”
FELIX SAMUEL REYNOSO VENTURA,
a/k/a “Fili,”
a/k/a “Filly The Kid,”
CARLOS JAVIER ESTEVEZ,
LOUIS JUNIOR RODRIGUEZ SERRANO,
a/k/a “Junior,”
MIGUEL ANGEL VASQUEZ,
a/k/a “Miguel Disla,”
JOVANNI ANTONIO ROSARIO GARCIA,
a/k/a “Porky,”
a/k/a “Chop,” and
JOSE ISMAEL DILONE RODRIGUEZ,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, and all property traceable to such property.

**FORFEITURE ALLEGATION AS TO COUNTS SEVENTEEN THROUGH
NINETEEN**

17. Upon conviction of the money laundering offenses in violation of 18 U.S.C. § 1956 alleged in Counts Seventeen through Nineteen of this Indictment, the defendants,

RAFAEL PARRA ARIAS,
a/k/a “Yofre,”
NEFY VLADIMIR PARRA ARIAS,
a/k/a “Keko,”
NELSON RAFAEL GONZALEZ ACEVEDO,
a/k/a “Nelson Tech,”
RAFAEL AMBIORIX RODRIGUEZ GUZMAN,
a/k/a “Max Morgan,”
MIGUEL ANGEL FORTUNA SOLANO,
a/k/a “Botija,”
a/k/a “Boti,”
FELIX SAMUEL REYNOSO VENTURA,
a/k/a “Fili,”
a/k/a “Filly The Kid,”
CARLOS JAVIER ESTEVEZ,
LOUIS JUNIOR RODRIGUEZ SERRANO,
a/k/a “Junior,”
MIGUEL ANGEL VASQUEZ,
a/k/a “Miguel Disla,”
JOVANNI ANTONIO ROSARIO GARCIA,
a/k/a “Porky,”
a/k/a “Chop,” and
JOSE ISMAEL DILONE,

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), all property, real and personal, involved in the money laundering offenses, and all property traceable to such property.

Substitute Assets Provision
(Applicable to All Forfeiture Allegations)

18. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

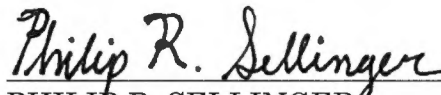
the United States shall be entitled, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b) and 28 U.S.C. § 2461(c), to forfeiture of any other property of the defendants up to the value of the forfeitable property described above.

A TRUE BILL

[REDACTED]
FOREPERSON



AMANDA N. LISKAMM
Director
Consumer Protection Branch



PHILIP R. SELLINGER
United States Attorney
District of New Jersey

CASE NUMBER: 24-00006

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

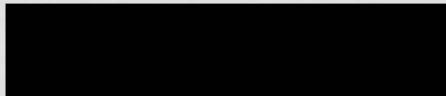
v.

**JUAN RAFAEL PARRA ARIAS, a/k/a "Yofre,"
NEFY VLADIMIR PARRA ARIAS, a/k/a "Keko,"
NELSON RAFAEL GONZALEZ ACEVEDO, a/k/a "Nelson Tech,"
RAFAEL AMBIORIX RODRIGUEZ GUZMAN, a/k/a "Max Morgan,"
MIGUEL ANGEL FORTUNA SOLANO, a/k/a "Botija," a/k/a "Boti,"
FELIX SAMUEL REYNOSO VENTURA, a/k/a "Fili," a/k/a "Filly The Kid,"
CARLOS JAVIER ESTEVEZ,
LOUIS JUNIOR RODRIGUEZ SERRANO, a/k/a "Junior,"
MIGUEL ANGEL VASQUEZ, a/k/a "Miguel Disla,"
JOVANNI ANTONIO ROSARIO GARCIA, a/k/a "Porky," a/k/a "Chop," and
JOSE ISMAEL DILONE RODRIGUEZ**

INDICTMENT FOR

**18 U.S.C. § 1349
18 U.S.C. § 1341
18 U.S.C. § 1343
18 U.S.C. § 1956
18 U.S.C. § 2**

A True Bill,



Foreperson

**PHILIP R. SELLINGER
UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY**

**CAROLYN SILANE, ASSISTANT U.S. ATTORNEY
JASON FELDMAN, JOSHUA FERRENTINO, AND EMILY POWERS
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